

**REMARKS**

Claims 1-25 are currently pending in the above-identified application. Claims 1 and 2 have been amended. Support for these amendments is found throughout the specification including, for example, in the originally filed claims and at paragraph 0010 and 0011. No new matter is added by these amendments.

**Double Patenting**

The Examiner has made a request for information citing 37 C.F.R. § 1.105 and MPEP 704.11(a), subsection G. MPEP 704.11(a), subsection G relates to identification of pending or abandoned applications filed by at least one of the inventors or assigned to the same assignee as the current application that disclose similar subject matter that are not otherwise identified in the current application. Applicant points out that the present application is a continuation of U.S. Patent Application No. 09/847,904 (now U.S. Patent No. 6,688,886), which is a continuation-in-part of U.S. Patent Application No. 09/539,021 (now U.S. Patent No. 6,371,761). In effort to be fully responsive to the Examiner's request, a terminal disclaimer is being filed with this response to disclaim U.S. Patent Nos. 6,688,886 and 6,371,761.

The Examiner's request also appears to request that Applicant provide a list of related co-pending applications and related patents with specific identification of claims which may present double patenting issues with the claims of the present application. Applicant points out that such a request goes beyond the information addressed in 37 C.F.R. § 1.105 and MPEP 704.11(a), subsection G. Applicant believes that an examination of a pending application for issues of patentability, including double patenting issues, is the responsibility of the Office rather than one of the Applicant. Nevertheless, in effort to be fully responsive to the Examiner's request, Applicant has conducted a preliminary review of other commonly assigned co-pending applications and patents and, while Applicant makes no representation with respect to double patenting issues, Applicant notes that those commonly assigned, co-pending or related patents may not constitute double patenting with respect to the currently claimed invention. However, if the Examiner believes that double patenting issues exist with respect to the present application,

Applicant will readily respond to any comment made by the Examiner with respect to any specific double patenting issues that the Examiner may believe to exist with respect to claims presented in the present application.

Information Disclosure Statement

It is stated in the Office action that the information disclosure statement (IDS) filed September 13, 2004 was defective because Applicant did not provide a legible copy of all non-U.S. patents. A supplemental IDS was submitted on April 20, 2006 and included legible copies of the submitted references.

Rejections under 35 U.S.C. §102

Claims 1-25 are rejected under 35 U.S.C. §102(b) as being clearly anticipated by Chishti *et al.* (PCT Publication WO 98/58596 A1).

Although Applicant respectfully disagrees with the rejections and does not acquiesce to any reasoning provided by the Examiner, claim 1 has been amended in order to expedite prosecution of the present case. As amended, claim 1 is directed to a computer-implemented method for separating a three-dimensional polygonal structure, comprising determining a piece-wise continuous curve on the surface of the structure; and separating the structure into two objects based on the piece-wise continuous curve. Applicants submit that the cited reference fails to teach each and every element of the claimed invention.

Applicant further submits that the cited reference fails to teach the various elements that are recited in dependent claims 2-25.

Accordingly, Applicant respectfully requests that the rejections of claims 1-25 under 35 U.S.C. §102(b) be removed.

Claims 1-25 are rejected under 35 U.S.C. §102(e) as being clearly anticipated by Jones *et al.* (U.S. Patent No. 6,409,504).

Although the Examiner has generally cited to the Jones reference in rejecting the claims, Applicant is unclear where in the Jones reference the Examiner believes the elements

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recited in claim 1 and dependent claims 2-25 are found. Applicant has reviewed the Jones reference and are unable to find each and every element of current claim 1 or each and every element recited in dependent claims 2-25. As such, Applicant believes that a prima facie case of anticipation does not exist with respect to the current claims and the cited reference.

Accordingly, Applicant respectfully requests that the rejection of claims 1-25 under 35 U.S.C. §102(e) be removed.

**CONCLUSION**

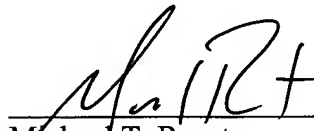
In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 206-467-9600.

Respectfully submitted,

Date: \_\_\_\_\_

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